

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

SHOSHANTI BARJO,

Plaintiff,

v.

VIVIAN R. CHERIAN, KENNETH M.  
CHERIAN, and ABERDEEN HOUSE, INC.

Defendants.

**Case No. 8:18-cv-01587-RWT**

**EMERGENCY MOTION FOR A PROTECTIVE ORDER**

Plaintiff Shoshanti Barjo (“Plaintiff”) respectfully moves for a protective order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure barring Defendants Kenneth M. Cherian, Vivian Cherian, and other members of the Cherian family from attending her deposition in person. Plaintiff additionally requests expedited consideration of the instant Motion because her deposition is scheduled to occur on February 21, 2019. *See* Local Rules, App’x A, Rule 1(g) (providing for expedited consideration of time-sensitive discovery disputes). A Memorandum in support of the instant Motion, a Declaration from Plaintiff, and a Proposed Order are attached.

Date: February 11, 2019  
Washington, DC

Respectfully submitted,

/s/ David W. DeBruin

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the attached Motion and supporting documents with the Clerk of Court using the CM/ECF system, which will provide notice of filing to all attorneys of record.

/s/ David W. DeBruin  
David W. DeBruin